

July 7, 2017

US EPA RECORDS CENTER REGION 5



539647

Harvey Sheldon
222 North LaSalle Street, Suite 300
Chicago, IL 60601

William Hefner
2263 Waters Drive
Mendota Heights, MN 55120

RE: St. Louis Park Solvent Plume Preliminary Assessment

Dear Mr. Sheldon and Mr. Hefner:

The Minnesota Pollution Control Agency ("MPCA") received your letter, dated May 24, 2017, submitted on behalf of your clients, Daikin Applied Americas Inc. and Super Radiator Coils LP, regarding the site located at 6714 Walker Street in St. Louis Park. Thank you for your comments. The letter provides comments regarding the MPCA's 2015 Preliminary Assessment Report for the St. Louis Park Solvent Plume Site and indicates that the Preliminary Assessment Report should be withdrawn from USEPA consideration.

The Preliminary Assessment report is a **preliminary** document that follows prescribed Site Assessment methodology outlined in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) to determine if there is a **potential** for exposure to hazardous substances based on certain criteria established in law (i.e., whether there is a potential for exposure to hazardous substances; whether there are potential exposure pathways that could be affected) and whether there is a potential that the contamination at a site could be sufficiently substantial to require federal intervention by listing on the National Priorities List (NPL). The Preliminary Assessment guidance is EPA/540/G-91/013.

The *Preliminary* Assessment report is a screening level evaluation, and it is not intended to be a complete investigation report. It does not explain how chemicals of concern migrate, nor is it intended to be a thorough analysis of subsurface conditions with a comprehensive site conceptual model (including groundwater modeling noted in your May 24, 2017 letter). The scope of the Preliminary Assessment is defined in Section 420 of the National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR Part 300). The Preliminary Assessment does not, as indicated in your May 24, 2017 letter, "chase after specific sources" that are identified in the Site Assessment process. All of these items are beyond the scope and regulatory intent of the Preliminary Assessment and are addressed in later stages of the Superfund process (e.g., the Remedial Investigation).

While it is true that the Preliminary Assessment Report notes several *potential* source areas being investigated (including at least 15 different properties), it does not identify Responsible Parties, nor does it make allegations of misdeeds. That is beyond the scope of the EPA Preliminary Assessment process. As the first stage of investigation conducted for every site in the Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS), the Preliminary Assessment is a relatively quick, low-cost compilation of existing information about the site and its surrounding area, with an emphasis on obtaining comprehensive information on people and resources that might be threatened by a release from the site. Consequently, the document simply identifies data collected that is relevant to the St. Louis Park solvent plume site and reports that data pursuant to CERCLA.

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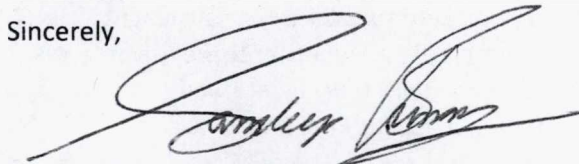
As noted in the Preliminary Assessment Report, hazardous substances (chlorinated volatile organic compounds [cVOCs]) have been detected in six municipal water supply wells from two different communities. Concentrations of the cVOCs are sufficiently high to require two of the St. Louis Park wells to be removed from production until a treatment facility can be constructed to remove these contaminants. Furthermore, cVOC concentrations in two of the Edina wells were high enough to require these wells to be off-line until a treatment facility was constructed in 2012. There is a clear primary exposure pathway via the groundwater-drinking water pathway.

The footprint of the groundwater plume covers several square miles, affecting at least two different communities' drinking water supplies. Without intervention, the groundwater contamination plume has the potential to expose over 100,000 citizens in those communities to potentially harmful levels of contaminants. Therefore, the municipal well impacts warrant further evaluation.

The Preliminary Assessment Report was prepared by MPCA under a Cooperative Agreement with the USEPA. The USEPA has finalized the Preliminary Assessment report and is currently using that information pursuant to its federal processes. As such, the MPCA is unable to honor your demand to immediately withdraw the Preliminary Assessment Report from USEPA's consideration. However, your comments on the Preliminary Assessment report will be placed in the site file.

Please contact me at 651-757-2256 or email at sandeep.burman@state.mn.us if you have further questions.

Sincerely,



Sandeep R. Burman, PG, Manager
Site Remediation & Redevelopment Section
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SB/JJ:bhj

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cc: Denise Boone, Chief, Site Assessment and Grants Section, EPA Region 5